

Received & Inspected

FEB 27 2018

FCC Mailroom

BATTLES COMMUNICATIONS INC.
573-624-8212 fax-573-624-1983
support@battles wireless.com

2-21-2018

DOCKET FILE COPY ORIGINAL

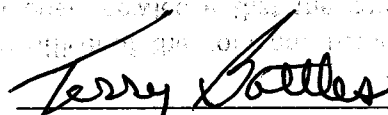
RE: Annual 47 C.F.R. CPNI Certification
Covering Clander Year----2018
EB Docket No. 06-36
Battles Communications Inc
499 Filer ID-825776/FRN-0003903200

CERTIFICATION

I, Terry Battles, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during----2018---that are adequate to ensure compliance with the ---CPNI---rules set forth in-- 47 CFR 64.2001--of the rules of the FCC.

Attached to this certification is an accompanying statement that (1) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 DFR 64.2001 of the rules, (2) explains any actions taken against data brokers during the past year, (3) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI and (4) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI.

The company represents and warrants that the above certification is consistent with 47, CFR 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the US Code and may subject it to enforcement action.


Terry Battles

2-21-2018

No. of Copies rec'd _____
List ABCDE

STATEMENT

Battles Communications Inc (**SMR**) **IS NOT INTERCONNECTED TO THE PUBLIC SWITCH TELEPHONE NETWORK**, and consequently does not have the type of confidential and proprietary information that the --FCC/CPNI ---regulations are designed to protect.

Nevertheless, and out of an abundance of caution, Battles Communications Inc ("Carrier") has established the operating procedures detailed below that ensure compliance with the FCC regulations regarding the protection of CPNI :

- * Carrier has adopted a manual and keeps it updated with FCC/CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- * Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- * Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- * Carrier maintains a record of its and its affiliates sales and marketing campaigns that use it's customers CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties or where third parties were allowed to access to CPNI. The record includes a discription of each campaign, the specific CPNI that was used in the campaign and what products and sevicees were offered as a part of the campaign.
- * Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- * Carrier has established procedures to notify law enforcement and customers(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- * Carrier took the follwing actions against data brokers in 2017, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the FCC: **NONE**

- * The following information Carrier has with respect to the processes protestors are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI : **CARRIER HAS DETERMINED THAT NO PRETEXTER HAS ATTEMPTD TO ACCESS CPNI ON CARRIER'S SYSTEM**
- * The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI :
- * Number of customer complaints Carrier received in 2017 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI : **NONE**
- * Category of complaint :
- * Number of instances of improper access by employees: **NONE**
- * Number of instances of improper disclosure to individuals not authorized to receive the information: **NONE**
- * Number of instances of improper access to online information by individuals not authorized to view the information: **NONE**
- * Number of other instances of improper access or disclosure : **NONE**